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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS-ST. JOHN**

**UNITED STATES OF AMERICA,**                     )  
**Plaintiff,**   )     **15-CR-42-CVG-RM**  
**v.**   )  
**WAYNE A. G. JAMES,**                             )  
**Defendant.**

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**MOTION FOR CONTINUATION OF 17<sup>TH</sup> OCTOBER 2016 TRIAL DATE**

Comes now undersigned counsel and moves for more time in which to prepare for trial. The scheduled trial date of October 17<sup>th</sup> does not permit sufficient time in which undersigned counsel can effectively sift, analyze, and determine admissibility of more than 95,000 pages of information. Several evidentiary motions are under consideration, and more is anticipated as those pages are evaluated. This motion is not made for the purpose of delay. Plaintiff has expressed a no-objection to this motion. A waiver under the Speedy Trial Act will be executed by Defendant, and filed on or before October 5, 2016. Wherefore, it is respectfully requested this motion be granted.

Dated: September 30, 2016

/s/ Michael A. Joseph

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Motion to Continue trial date, p.2.

Michael A. Joseph

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 30, 2016, I electronically filed the foregoing with the CM/ECF system, which will send notification of such filing to United States Attorney Ronald Sharpe, Esq., Att: Justin Weitz, Esq., Assistant U.S. Attorney, at the Office of the United States Attorney, Ron de Lugo Federal Building, Veterans Drive, St. Thomas, USVI.

/s/ Michael A. Joseph, Esq.